

UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: DARLENE L. LOOKINGBILL : CHAPTER 13  
Debtor :  
: :  
JACK N. ZAHAROPOULOS :  
STANDING CHAPTER 13 TRUSTEE :  
Movant :  
: :  
vs. :  
: :  
DARLENE L. LOOKINGBILL :  
Respondent : CASE NO. 1-24-bk-00754

TRUSTEE'S OBJECTION TO FIRST AMENDED CHAPTER 13 PLAN

AND NOW, this 12<sup>th</sup> day of July 2024, comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee, and objects to the confirmation of the above-referenced Debtor(s)' Plan for the following reason(s):

1. Failure to properly state the liquidation value in Section 1B of the Plan. Trustee calculates it at \$108,672.00.
2. The Trustee avers that Debtor(s)' Plan is not feasible based upon the following:
  - a. Insufficient Monthly Net Income as indicated on Schedules I and J.
  - b. The Plan is underfunded relative to claims to be paid – 100% Plan. Trustee calculates approximately \$48,560.00 is needed to fully fund the Plan.
3. The Trustee provides notice to the Court as to the ineffectiveness of Debtor(s) Chapter 13 Plan for the following reasons:
  - a. Clarification of Debtor(s) counsel fees which are in conflict with 2016(b) Statement. The fees exceeds the presumptively reasonable fee of \$4,5000.00.

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WHEREFORE, Trustee alleges and avers that Debtor(s) Plan cannot be confirmed and therefore Trustee prays that this Honorable Court will:

- a. Deny confirmation of Debtor(s) Plan.
- b. Dismiss or convert Debtor(s) case.
- c. Provide such other relief as is equitable and just.

Respectfully submitted:

/s/Jack N. Zaharopoulos  
Standing Chapter 13 Trustee  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036  
(717) 566-6097

CERTIFICATE OF SERVICE

AND NOW, this 12<sup>th</sup> day of July 2024, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Hummelstown, Pennsylvania, postage prepaid, first class mail, addressed to the following:

MICHAEL A CIBIK, ESQUIRE  
CIBIK LAW, PC  
1500 WALNUT ST, SUITE 900  
PHILADELPHIA, PA 19102-

/s/Tammy Life

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Office of Jack N. Zaharopoulos  
Standing Chapter 13 Trustee